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Attorneys for Defendant  
Otto Trucking LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBIT 1 TO THE DECLARATION OF  
HONG-AN VU IN SUPPORT OF ITS  
REPLY IN SUPPORT OF MOTION TO  
ENFORCE THE COURT'S JUNE 7, 2017  
ORDER (DKT. 563)**

Date: August 16, 2017

Time: 8:00 a.m.

Courtroom: 8, 19th Floor

Judge: Honorable William Alsup

Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Document Under Seal
2. [Proposed] Order
3. Unredacted Version of Ex. 1
4. Proof of Service

I, Hong-An Vu, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Exhibit 1 to the Declaration of Hong-An Vu in Support of Its Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to the Declaration of Hong-An Vu in Support of Defendant Otto Trucking’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563) (“Exhibit 1”)	Entire Document

3. Otto Trucking seeks to seal the entirety of Exhibit 1 because Plaintiff Waymo LLC (“Waymo”) has designated the information “highly confidential” and “attorneys’ eyes only.” Otto Trucking does not oppose the merits of sealing the material designated by Waymo, and anticipates that Waymo will file declarations in accordance with Local Rule 79-5.

4. Otto Trucking’s request to seal is narrowly tailored to those portions of the motion’s supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of July, 2017 in Los Angeles, California.

/s/ Hong-An Vu  
Hong-An Vu